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Attorney for Jerome Michael Bell

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEROME MICHAEL BELL,

Defendant.

Case No. 2:15-cr-00011-JCM-CWH

**Stipulation and Order to Extend
Deadline to Supplement Compassionate
Release (Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Jerome Michael Bell, and Jim Fang, counsel for the United States of America, that the September 8, 2024 deadline (ECF No. 260) on which defendant must file his supplement in support of compassionate release be extended 21 days from the day of this filing, to on or before September 29, 2024.

This stipulation is entered into based upon the following reasons:

1. Counsel for Defendant was appointed to Mr. Bell to supplement his motion for compassionate release on December 28, 2023. (ECF No. 250).
2. According to Amended General Order 2020-06 In Re: Compassionate Release Requests Under the First Step Act, the FPD must file a supplement to the defendant's pro se motion within thirty days.
3. At the time of Ms. Tirinnanzi's appointment to supplement Mr. Bell's motion, he

1 was in custody on a writ at the Clark County Detention Center (“CCDC”). On
2 February 2, 2024, when defense counsel was approved for communication and
3 visitation with Mr. Bell at CCDC, she was made aware that Mr. Bell was no longer
4 at the facility.

- 5 4. Due to Mr. Bell’s transport from CCDC back to Beaumont USP, communication
6 with Mr. Bell and defense counsel was delayed until February 23, 2024.
- 7 5. Initially Mr. Bell was unresponsive to follow up written attorney-client
8 communication. An additional attempt was made, and according to USPS tracking
9 services, on April 12, 2024, Beaumont USP rejected attorney mail sent to Mr. Bell.
10 It is necessary for Mr. Bell to receive the mail for purposes of moving forward with
11 his supplement to motion for compassionate release.
- 12 6. Defense counsel received a second call with Mr. Bell on May 13, 2024
13 (communication is challenging due to frequent lockdowns). Counsel was made
14 aware that Mr. Bell did not receive his attorney mail and therefore Mr. Bell has not
15 filled out documentation necessary for defense counsel to move forward with
16 supplementation of his motion for compassionate release.
- 17 7. Counsel for Mr. Bell has made attempts to schedule follow-up phone calls with Mr.
18 Bell. His Counselor, Bijou is out of office until August 17, 2024. Counsel is reliant
19 on Counselor Bijou to facilitate telephonic communications with Mr. Bell.
- 20 8. Upon Counselor Bijou’s return, a call with Mr. Bell was scheduled for August 30,
21 2024; however the call was cancelled. Counselor Bijou is on travel the week of
22 September 1, 2024, and will return the week of September 8, 2024, which is when a
23 call with the client will be facilitated.
- 24 9. Telephonic communication with the client who is detained, is required to complete
25 Mr. Bell’s supplement to motion for compassionate release. Obtaining
26 communication with penitentiary inmates is difficult due to institutional security and
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frequent lockdowns at Beaumont USP.

10. The parties agree to the extension of time for 21 days.

11. This is the third request for extension of time.

Dated this 5th day of September 2024.

Respectfully Submitted,

/s/ Jim Fang
JIM FANG, ESQ.
Assistant United States Attorney

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Counsel for Jerome Michael Bell

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Order

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant's supplementation in support of compassionate release shall be due on or before September 29, 2024, the Government's response will be due 14 days from the date the supplement is filed, and Defendant's counsel will have seven days following submission of the response to file a reply.

DATED: September 6, 2024.



THE HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE